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18 Attorneys for Defendant,
19 **COUNTY OF LOS ANGELES, MICHELE LOYA-CHHABRA, XIOMARA**
20 **FLORES-HOLGUIN, MELANIE PELLERIN, TIKA SMITH, BELINDA**
21 **WILLIAMS, ORELL WILLIAMS, and CYNTHIA COLEMAN**

22 UNITED STATES DISTRICT COURT
23 CENTRAL DISTRICT OF CALIFORNIA

24 DARLENE FERGUSON and RYAN
25 K., individuals

26 Plaintiff,

27 vs.

28 COUNTY OF LOS ANGELES;
MICHELE LOYA-CHHABRA, in her
personal capacity; XIOMARA
FLORES-HOLGUIN, in her personal
capacity; BRENDA E. BERRYHILL, in
her personal capacity; MELANIE
PELLERIN, in her personal capacity;
TIKA SMITH, in her personal capacity;
BELINDA WILLIAMS, in her personal
capacity; ORELL WILLIAMS, in her
personal capacity; CYNTHIA
COLEMAN, in her personal capacity;
and DOES 1 THROUGH 10,
INCLUSIVE,

Defendants.

Case No.: CV12-06865 JAK (Ex)

JOINT RULE 16(b) REPORT

1 Pursuant to Federal Rules of Civil Procedure 26(f), a meeting was held on
2 March 20, 2013, via telephone conference. The participants were Liana Serobian,
3 attorney for Plaintiffs DARLENE FERGUSON and RYAN K., a minor, by and
4 through his Guardian Ad Litem; and Danielle F. Drossel, Esq., attorney for
5 Defendants COUNTY OF LOS ANGELES, MICHELE LOYA-CHHABRA,
6 XIOMARA FLORES-HOLGUIN, MELANIE PELLERIN, TIKA SMITH,
7 BELINDA WILLIAMS, ORELL WILLIAMS, and CYNTHIA COLEMAN.
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11 The Parties herein, having met and conferred, now submit the following
12 Joint Rule 16(b) Report in this matter as follows:
13

14 a. **Statement of the Case**

15 **(1) Nature and Basis of Plaintiffs' Claims:**

16 This suit, brought under 42 U.S.C. § 1983, arises from the alleged
17 warrantless removal of a nine-year old boy, plaintiff R.K. ("R.K."), on August 20,
18 2010, from the custody and care of his mother, plaintiff Darlene Ferguson
19 ("mother"), the only custodial parent the child had known during his life. On
20 August 14, 2010, mother was involved in a vehicular incident, after which she was
21 arrested and served jail for 10 days because she did not have the funds to post a
22 bond. R.K. was not involved or present at the incident and mother placed him in
23 the care of his maternal grandmother during the 10-day period, with whom the
24 child was strongly bonded. Mother had no previous arrests or run-ins with the law
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1 and the original charges for this isolated incident were dropped, with her pleading
2 to a misdemeanour assault and receiving a summary probation. Despite the fact
3 that mother had placed R.K. with the maternal grandmother, an appropriate
4 placement option deemed by the Los Angeles County Department of Children and
5 Family Services ("DCFS") social workers, and R.K. denied any kind of abuse
6 and/or neglect and there were no signs of such, on August 17, 2010, social workers
7 threatened that if the grandmother did not bring R.K. to their office for an
8 interview they would remove him from her care. At the in-office interview on
9 August 20, 2010, where no signs of abuse or neglect were established, the DCFS
10 social worker CHHABRA and her supervising social worker FLORES-HOLGUIN,
11 took R.K. into protective custody without a warrant and then placed him back with
12 the maternal grandmother (the same placement chosen by mother) on the sham
13 grounds of caretaker absence (mother's incarceration) and emotional abuse.

14
15 This suit further arises from the subsequent deceptive misrepresentations,
16 fabrications, and suppression of evidence by various DCFS social workers before
17 the juvenile court in order to ensure that Plaintiffs would not, and could not obtain
18 a fair hearing before the Juvenile Court. In its original dependency petition filed
19 on R.K.'s behalf, in addition to other allegations, the social workers alleged that
20 R.K.'s father, Garland K. ("father"), had failed to pay child support and, therefore,
21 pursuant to the Welfare and Institutions Code section 300, subdivision (g), he had

1 failed to support his child. However, by the time of the hearing on the petition, the
2 social workers were recommending that R.K. be placed in the physical custody of
3 his father and termination of jurisdiction over R.K. with sole legal and physical
4 custody to father - despite the fact that R.K. had not seen his father for three years
5 and father had failed to support or maintain a relationship in any way. To achieve
6 this goal, at the hearing on the petition, the DCFS social workers recommended
7 that the allegations against father that made him an offending parent be dismissed
8 so that the court could place R.K. in father's custody and terminate jurisdiction.
9 Doing so, the social workers concealed from the juvenile court the evidence that
10 father had failed to pay child support ordered by the family court since January
11 2010 and had no bed for R.K. or other appropriate provisions for support at his
12 home.
13

14 As a result of these fabrications, concealments, and suppressions of evidence
15 by the DCFS social workers, mother was deprived of a fair hearing and the
16 juvenile court relied on their recommendations in terminating jurisdiction over
17 R.K. with both legal and physical custody granted to an essentially absentee parent,
18 R.K.'s father. Thereafter, for close to two years while R.K. remained in father's
19 physical custody, R.K. suffered severe neglect in the hands of his father. R.K.
20 slept on the floor in the father's home, was medically neglected by his father when
21 had an ear infection (mother provided the medical care), had extensive absences
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1 from school and father was referred to the District Attorney's office for that
2 reason, was left at school for about two hours after the school closed, was
3 constantly left at the home of the father's girlfriend's mother, was failing his
4 classes and the school year. R.K. was no longer involved in the many sports and
5 extracurricular activities mother had him enrolled.
6
7

8 Father also denied mother any visitation with R.K. and mother was forced to
9 visit him at school during lunch time, during which time she did his homework,
10 bought him books and other learning materials, clothes and shoes, and all other
11 necessities of life. Mother informed the social workers that R.K. was sleeping on
12 the floor and that his medical and educational needs were neglected, but those were
13 ignored and no investigation was done on R.K.'s care in father's home. Mother
14 battled through the family court, juvenile court, and appellate court systems to
15 finally regain custody of her son, R.K., almost two years after his warrantless
16 removal by the DCFS social workers. R.K. was again enrolled in sports and other
17 after-school activities; is healthy and flourishing in mother's custody.
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22 Plaintiffs further allege that the County of Los Angeles has several
23 unconstitutional policies, practices, or customs, which were the "moving force"
24 behind the violations alleged. See, *Monell v. Department of Social Services of the*
25 *City of New York*, 436 U.S. 658 (1978). Among others, Plaintiffs allege that the
26 County has:
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28

1 a. the policy of detaining and/or removing children from their
2 family and homes without exigent circumstances (imminent danger of serious
3 physical injury), court order and/or consent;

4 b. the policy of removing children from their family and their
5 homes without first obtaining a warrant or other court order when no exigency
6 exists;

7 c. the policy of examining children without exigency, need, or
8 proper court order, and without the presence and/or consent of their parent or
9 guardian;

10 d. the policy of removing and detaining children, and continuing
11 to detain them for an unreasonable period after any alleged basis for detention is
12 negated.

13 e. the policy of using trickery, duress, fabrication and/or false
14 testimony and/or evidence, and in failing to disclose exculpatory evidence, in
15 preparing and presenting reports and court documents to the Court, causing an
16 interference with the Plaintiff's rights, including those as to familial relations; and

17 f. by acting with deliberate indifference in implementing a policy
18 of inadequate training, and/or by failing to train its officers, agents, employees and
19 state actors, in providing the constitutional protections guaranteed to individuals,
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1 including those under the Fourth and Fourteenth Amendments, when performing
2 actions related to child abuse and dependency type proceedings.

3
4 g. by acting with deliberate indifference in implementing a policy
5 of inadequate supervision, and/or by failing to adequately supervise its officers,
6 agents, employees and state actors, in providing the constitutional protections
7 guaranteed to individuals, including those under the Fourth and Fourteenth
8 Amendments, when performing actions related to child abuse and dependency type
9 proceedings.
10
11

12 h. The policy of making false allegations in a Juvenile
13 Dependency Petitions, i.e. alleging that a parent has failed to protect a child under
14 Welfare and Institutions Code §300(b), where there is no evidentiary basis to
15 support the charge.
16
17

18 Plaintiffs allege that the County of Los Angeles, by and through its
19 policymakers, were deliberately indifferent to the obvious consequences of their
20 implementation of the unconstitutional policies, practices and customs, identified
21 above.
22

23
24 **(2) Defendants' Claimed Defenses:**

25 Defendants County of Los Angeles and DCFS social workers contend that
26 exigent circumstances existed so as to justify the Defendants' alleged lack of a
27 warrant/prior judicial authorization in detaining the minors. Further, their actions
28

1 were reasonable, necessary, authorized and lawful pursuant to California Welfare
2 and Institutions Code, §§ 300, 305, 307 and 309. Defendants allege, without
3 admitting liability or the truth of Plaintiffs' allegations, that Defendants had
4 authority to take custody of minor Ryan K., pursuant to California Welfare and
5 Institutions Code, §§ 305 and 306, and that the actions of these answering
6 Defendants were reasonable, proper, authorized and lawful.
7

8
9 Defendants further contend that their actions are protected by absolute
10 and/or qualified immunity. Defendants contend that they are entitled to qualified
11 immunity because the applicable law was not clearly established and because a
12 reasonable official in the same position could have believed that their conduct was
13 lawful. In addition, Defendants are entitled to qualified immunity since Defendants
14 are public officials and the actions complained of involved discretionary functions
15 that were not prohibited by law. Defendants are also entitled to absolute immunity
16 from the claims, causes of action and allegations of Plaintiffs, pursuant to the
17 absolute, judicial, prosecutorial and testimony privilege of federal and state law.
18

19
20 Defendants further contend that they are immune from the claims, causes of
21 action and allegations of Plaintiffs, pursuant to Federal and State law and
22 decisional authority, including California Meyers v. Contra Costa County
23 Department of Social Services (9th Cir. 1987) 812 F.2d 1154; Government Code §
24 820.2; F.E. Trotter, Inc. v. Watkins (9th Cir. 1989) 869 F.2d 1312, 1314; Harlow v.
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1 Fitzgerald (1982) 457 U.S. 800, 818, 102 S.Ct. 2727, 2738, 73 L.Ed.2d 396; Imbler
2 v. Pachtman (1976) 424 U.S. 409; Gensburg v. Mcmillen (1994) 31 Cal.App.4th
3 512; Butz v. Economou (1978) 438 U.S. 478; Demery v. Kupperman (9th Cir.
4 1984) 735 F.2d 1139; Becerra v. County of Santa Cruz (1999) 68 Cal.App.4th
5 1450, 81 Cal.Rptr.2d 165, citing Ronald S. v. County of San Diego (1993) 16
6 Cal.App.4th 887, 898.

7
8
9 The County further contends that it does not have any unconstitutional
10 policy, practice, procedure or custom, and therefore cannot be held liable.

11
12 In addition, Defendants contend that any acts, conduct or statements made
13 by the County or any of its employees were privileged pursuant to California law,
14 including, but not limited to California Civil Code § 47. Defendants contend that a
15 juvenile dependency investigation qualifies as a “judicial or official proceeding
16 authorized by law,” under section 47(b)(2) and (3). Therefore, any statements or
17 writings made in connection with the dependency proceeding in this case would be
18 privileged. Defendants further contend, without admitting liability or the truth of
19 Plaintiff’s allegations, that any statements made about Plaintiffs were true.
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24 **b. Subject Matter Jurisdiction**

25 This Court has jurisdiction of the subject matter of this action based on the
26 federal question asserted under 42 U.S.C. § 1983, and on the state claims under 26
27 U.S.C. §1367(a).
28

1 **c. Legal Issues**

2 (1) Federal Claims

3
4 With respect to Plaintiffs' federal claims, the core issue before the Court, as
5 to liability of the Defendants, is whether Defendants violated Plaintiffs' federal
6 rights under 42 U.S.C. §1983 under the constitutional rights guaranteed by the
7 First, Fourth and/or Fourteenth Amendment. Another issue is whether, even if
8 there was a constitutional violation, the County and individual Defendants are
9 protected by the absolute and/or qualified federal immunities. See Myers v. Contra
10 Costa County Dep't of Soc. Servs. (9th Cir. 1987) 812 F.2d 1154, 1157; Parkes v.
11 County of San Diego (S.D. Cal. 2004) 345 F.Supp. 2d 1071, 1086-1087; Saucier v.
12 Katz (2001) 533 U.S. 194, 201-202.

13
14 As to liability of the County of Los Angeles, the central issue is whether the
15 County maintained a policy, practice, procedure or custom that was the "moving
16 force" behind any violation of Plaintiffs' rights. See Monell v. Department of
17 Social Services (1978) 436 U.S. 658.

18 (2) State Claims

19 Plaintiffs' state law claims include the following: (1) intentional infliction of
20 emotional distress; and (2) violation of state civil rights. The core issues with
21 respect to liability of Defendants are whether Defendants intentionally caused
22 Plaintiffs emotional distress and whether they violated Plaintiffs' state civil rights.

1 Another issue is whether Plaintiffs' state law claims are barred because Plaintiffs
2 failed to timely file a government claim pursuant to California Government Code
3 §§ 900, et seq., which prescribes the manner in which public entities may be sued.
4

5 Another issue is whether, even if there was a violation, the County and
6 individual Defendants are protected by the absolute and/or qualified state statutory
7 immunities, including but not limited to California Government Code §§ 821.6,
8 820.2, 820.21 and 815.2.
9

10
11 **d. Parties, Evidence, etc.**

12 1. Parties

13
14 Plaintiffs:

- 15
 - Plaintiff Darlene Ferguson
 - 16
 - Plaintiff Ryan K., a minor
 - 17

18 Defendants:

- 19
 - Defendant County of Los Angeles, a government entity
 - 20
 - Defendant Michele Loya-Chhabra
 - 21
 - Defendant Xiomara Flores-Holguin
 - 22
 - Defendant Brenda Berryhill
 - 23
 - Defendant Malanie Pellerin
 - 24
 - Defendant Tika Smith
 - 25
 - Defendant Belinda Williams
 - 26
 - 27
 - 28

- Defendant Orell Williams
- Defendant Cynthia Coleman

2. Percipient Witnesses

Plaintiffs' Witnesses:

- Representatives of DCFS who will testify regarding pertinent matters related to underlying dependency case.
- Garland K. (father of minor Ryan K.)
- Garrick G. (father of Ryan K.'s half-sibling)
- Relatives and friends of Darlene Ferguson and Ryan K., who have yet to be identified, regarding their percipient knowledge of the subject events and who may have discoverable information related to Plaintiffs' allegations.
- Any Health Care Professionals who examined, treated, or consulted with Plaintiffs and who have knowledge regarding the subject matter of this lawsuit and Plaintiffs' alleged damages, all of whom have yet to be identified.
- Los Angeles County Sheriff's Department and/or Los Angeles Police Department deputies regarding their contact with Plaintiffs and their percipient knowledge of the events which are the subject of this lawsuit.

- School teachers and officials, who have yet to be identified, regarding their percipient knowledge of the underlying lawsuit and subject events.
- Other witnesses and entities who have knowledge of this lawsuit and damages and whom have yet to be identified.

Defendants' Witnesses:

- Representatives of DCFS who will testify regarding pertinent matters related to underlying dependency case.
- Garland K. (father of minor Ryan K.)
- Garrick G. (father of Ryan K.'s half-sibling)
- Relatives and friends of Darlene Ferguson and Ryan K., who have yet to be identified, regarding their percipient knowledge of the subject events and who may have discoverable information related to Plaintiffs' allegations.
- Any Health Care Professionals who examined, treated, or consulted with Plaintiffs and who have knowledge regarding the subject matter of this lawsuit and Plaintiffs' alleged damages, all of whom have yet to be identified.
- Los Angeles County Sheriff's Department and/or Los Angeles Police Department deputies regarding their contact with Plaintiffs and their

1 percipient knowledge of the events which are the subject of this
2 lawsuit.

- 3
- 4 • School teachers and officials, who have yet to be identified, regarding
- 5 their percipient knowledge of the underlying lawsuit and subject
- 6 events.
- 7
- 8 • Other witnesses and entities, who have knowledge of this lawsuit and
- 9 damages and whom have yet to be identified.
- 10

11 **f. Insurance**

12 Defendant County of Los Angeles is a public entity and is self-insured under
13 California Government Code Section 990.4.

14 **g. Damages.**

15
16 At this point in time, damages include emotional distress damages subject to
17 proof at trial, compensatory damages, attorneys fees and costs incurred in the
18 R.K.'s family law case.
19
20

21 **h. Manual of Complex Litigation**

22 N/A.

23
24 **i. Status of Discovery**

25 No discovery has been taken by either party to date. The parties will
26 exchange initial disclosures by March 27, 2013.
27
28

1 **PARTIES' PETITIONS FOR RELEASE OF CONFIDENTIAL RECORDS**

2 **PURSUANT TO WIC § 827**

3
4 In order to protect the privacy rights of children, the legislature has enacted a
5 procedure by which juvenile records may only be obtained or inspected by the
6 filing of a petition with the Juvenile Court, pursuant to California Welfare &
7 Institution Code § 827 and California Rules of Court, Rule 5.552. Since the
8 underlying incident involved a Juvenile Dependency investigation, the pertinent
9 records in this matter are confidential and the Juvenile Court has exclusive
10 authority to determine when juvenile records will be released to the Parties.
11
12

13
14 On February 12, 2013, defense counsel filed Petitions for the release of
15 confidential information under Welfare & Institution Code Section 827 with the
16 Juvenile Court. Likewise, plaintiffs' counsel intends to file the said Petitions on
17 March 25, 2013.
18

19 In defense counsel's own experience and based on knowledge from
20 colleagues in similar cases, it typically takes between 8-14 months to receive
21 Juvenile records pursuant to a Section 827 Petition. Since rules related to
22 confidentiality preclude disclosure of information about a juvenile case prior
23 to the Juvenile Court granting the Section 827 petitions, the Parties agree that
24 discovery cannot commence in earnest until after these documents have been
25 produced by the Juvenile Court. For these reasons, the Parties estimate a
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1 discovery completion date of November 2014 and propose a trial date of April
2 2015.
3

4 However, in defense counsel's experience, the 827 Petition process is not the
5 only process, and the federal court can issue an order directing the production of
6 juvenile case file documents (this includes the files of the court, and of the
7 agency), in a much shorter period of time. The federal court has the authority to
8 make such orders, and provided it makes the same kinds of limited-use and
9 distribution orders to preserve confidentiality that a juvenile court would make in
10 compliance with the California law on the subject, there is no basis not to use that
11 process, lest this matter be held up for a substantial period of time. The Parties are
12 in the process of conferring and coming up with a Joint Stipulation and Proposed
13 Order to present to this Court to direct the Juvenile Court to produce the case file
14 documents in a shorter time period.
15

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19 **j. Discovery Plan**

20 (1) Plaintiffs believe that discovery will be needed as to the following:

21 Plaintiffs anticipate taking a number of depositions, including several of the
22 individuals identified in the above Witness List. Because the juvenile court
23 records have not yet been received, it is presently unknown when Plaintiffs will be
24 able to begin taking depositions.
25
26
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28

1 Plaintiffs intend to request that this Court take judicial notice of the appellate
2 opinions issued by the California Court of Appeal in *In re Ryan K.* (2012) 207
3 Cal.App.4th 591 [reversing the juvenile court's order summarily denying mother's
4 request to modify previous custody order giving father sole legal and physical
5 custody of R.K.] and *In re Ryan K.* (June 17, 2011, B228247 [nonpub. opn.])
6 [partial reversal of the appealed orders, namely, reversing the juvenile court's
7 visitation order.) Plaintiffs also intend to request that this Court take judicial
8 notice of the related family law file if needed.
9

10
11
12 Plaintiffs will begin serving written discovery as soon as the County's
13 attorneys have been granted their Cal. Welf. & Inst. Code §827 order. Plaintiffs
14 anticipate that written discovery should be complete within six months after all
15 parties have gained access to confidential juvenile records.
16
17

18 (2) Defendants believe that discovery will be needed as to the following:

19 (i) Depositions: Defendants intend to take the depositions of both Plaintiffs
20 as well as the percipient witnesses identified above in (See Section d.). Defendants
21 intend to depose any and all percipient witnesses who have knowledge of the
22 subject events and relevant events which occurred before, during, and after the
23 subject incident and who may have relevant information related to Plaintiffs'
24 allegations and claimed damages. The identity of these witnesses will be obtained
25 upon further discovery. Defendants anticipate the need to depose at least five
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1 individuals (including the Plaintiffs) concerning the underlying incident and related
2 subject matter as well as Plaintiffs' allegations and damages.

3
4 (ii) Written discovery: Defendants anticipate further written discovery to be
5 propounded on both Plaintiffs, including Special Interrogatories, Requests for
6 Production and Requests for Admission.

7
8 (iii) Subject matter of discovery: Defendants anticipate that discovery will
9 be needed on facts and circumstances surrounding the underlying incident,
10 including Plaintiffs interactions with representative of DCFS, Plaintiffs conduct
11 relative to services provided by DCFS and other pertinent matters related to the
12 underlying dependency case. Discovery will also be needed with respect to
13 Plaintiffs' interactions with Los Angeles County Sheriff's Department and/or Los
14 Angeles Police Department during the underlying dependency case.

15
16 With respect to damages, Defendants also anticipate that discovery will be
17 needed from Plaintiffs' treating physicians with respect to Plaintiffs' claimed
18 damages including medical expenses and "great emotional and psychological
19 distress." Defendants intend to have Plaintiffs submit to a Defense Mental Exam
20 ("DME") to explore Plaintiffs' claimed psychological damages.

21
22 (3) Discovery Completion

23
24 See Schedule of Pretrial and Trial Dates, attached hereto as Exhibit "A."

1 **k. Discovery Cut-Off**

2 See Schedule of Pretrial and Trial Dates, attached hereto as Exhibit "A."

3
4 This schedule takes into account the anticipated delays described above,
5 which relate to the issues pertaining to disclosure of confidential records, pursuant
6 to WIC §827 (See Section "i").
7

8 **l. Expert Discovery**

9 See Schedule of Pretrial and Trial Dates, attached hereto as Exhibit "A."

10
11 **m. Dispositive and Other Motions**

12 Plaintiffs intend to file a Motion for Judicial Notice in regards to: the
13 appellate opinions issued by the California Court of Appeal in *In re Ryan K.*,
14 *supra*, 207 Cal.App.4th 591 [reversing the juvenile court's order summarily
15 denying mother's request to modify previous custody order giving father sole legal
16 and physical custody of R.K.] and *In re Ryan K.* (June 17, 2011, B228247
17 [nonpub. opn.]) [partial reversal of the appealed orders, namely, reversing the
18 juvenile court's visitation order); and, related family law file if needed. Plaintiffs
19 also anticipate filing a motion for judgment on the pleadings, or a Rule 56 motion
20 for partial summary judgment on their claims, and partial summary judgment as to
21 Defendant County's affirmative defenses.
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26 Defendants expect to file Motions for Summary Judgment/Partial Summary
27 Judgment on issues of liability and possibly damages after the close of discovery.
28

1 **n. Settlement/Alternative Dispute Resolution Statement**

2 No settlement discussions have taken place to date. The Parties are
3
4 amenable to having the assigned magistrate conduct a settlement conference.

5 **o. Trial Estimate**

6
7 Plaintiffs estimate that the length of trial will be 10 days and contemplates
8 calling between 15 and 20 witnesses.

9
10 Defendants estimate that the trial of this action will take approximately 5
11 days. Defendants presently estimate they will call approximately ten (10)
12 witnesses.

13
14 Both parties request a jury trial.

15 **p. Trial Counsel**

16
17 Plaintiffs' Trial Counsel:

18 Liana Serobian, SBN: 235466
19 SEROBIAN LAW, INC.
20 100 N. Brand Blvd., Suite 600
21 Glendale, CA 91203

22 Defendants' Trial Counsel:

23 David J. Weiss, SBN: 78542
24 Law Offices of David J. Weiss
25 11340 W. Olympic Blvd., Suite 100
26 Los Angeles, CA 90064
27 (310) 575-9566
weissd@djwlaw.com

28 **q. Independent Expert or Master** N/A.

1 **r. Timetable**

2 See Schedule of Pretrial and Trial Dates, attached hereto as Exhibit "A."

3
4 This schedule takes into account the anticipated delays described above,
5 which relate to the issues pertaining to disclosure of confidential records, pursuant
6 to WIC §827 (See Section "i").
7

8 **s. Other Issues**

9 None, other than the issues pertaining to disclosure of confidential records,
10 pursuant to WIC § 827 (See Section "i").
11

12 **t. Patent Cases**

13 N/A.
14

15 **u. Magistrate Judge Assignment**

16 The Parties do not consent to a Magistrate Judge assignment at this time.
17

18 March 25, 2013

SEROBIAN LAW, INC.
/s/ Liana Serobian

19
20 _____
21 LIANA SEROBIAN, ESQ.
22 Attorney for Plaintiffs,
23 **DARLENE FERGUSON, and**
RYAN K., a minor

24 March 22, 2013

LAW OFFICES OF DAVID J. WEISS
/s/ Danielle F. Drossel

25
26 _____
27 DAVID J. WEISS, ESQ.
28 DANIELLE F. DROSSEL, ESQ.
Attorneys for Defendant,
COUNTY OF LOS ANGELES, et al.

SCHEDULE OF PRETRIAL AND TRIAL DATES

Case No.:	CV12-06865 JAK (Ex)
Case Name:	Darlene Ferguson, et. al v. Los Angeles County, et. al

Matter	Plaintiff(s) Request	Defendant(s) Request	Court Order	
<input checked="" type="checkbox"/> Jury Trial [] Court Trial: (Tuesday at 9:00 a.m.) 5-10 Duration Estimate: ____ Days / ____ Weeks	4/15/14	4/14/15		
Status Conference re Exhibits: (Friday at 3:00 p.m.) Friday before the trial date	4/11/14	4/10/15		
Final Pretrial Conference: (Monday at 3:00 p.m.) 2 weeks before the trial	3/31/14	3/30/15		
Post Mediation Status Conference: (Monday at 1:30 p.m.) 30 days before the cut-off date	12/30/13	12/29/14		
Matter	Weeks Before Trial	Plaintiff(s) Request	Defendant(s) Request	Court Order
Last Date to Amend Pleadings/Add Parties		6/3/13	6/3/13	
Non-Expert Discovery Cut-Off	16	12/24/13	12/23/14	
Expert Disclosure (initial)	15	12/31/13	12/30/14	
Expert Disclosure (rebuttal)	11	1/28/14	1/27/15	
Last Date to Conduct Settlement Conference	10	2/4/14	2/3/15	
Expert Discovery Cut-Off	8	2/19/14	2/17/15	
Last Date to Hear Motions	8	2/18/14	2/16/15	

Settlement Procedure Selection (ADR-12 Form will be completed by Court): <input checked="" type="radio"/> 1. Magistrate Judge <input type="radio"/> 2. Attorney Settlement Officer Panel <input type="radio"/> 3. Outside ADR/Non-Judicial	M. J.	M. J.	
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Exhibit "A"